

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SHAWN DRUMGOLD,)	C.A. NO. 04-11193NG
Plaintiff)	
)	
v)	
)	
TIMOTHY CALLAHAN, ET AL.)	
Defendant(s))	
)	

JOINT MOTION FOR STATUS AND SCHEDULING CONFERENCE

Now come the parties and move this court to schedule a Status and Scheduling Conference in the above entitled matter. If possible in light of the court's schedule, Plaintiff requests a conference on February 14. Plaintiff's counsel Ms. Scapicchio is currently on trial in Suffolk Superior Court on a homicide case. That trial will be in recess on February 14, 2007.

In support thereof, the parties say the following:

1. This court has set a discovery deadline of February 14, 2007.
2. The parties have conducted substantial discovery in this matter including over twenty (20) depositions. The parties have been unable to complete discovery as quickly and as thoroughly as hoped because of several issues including the Motions concerning the diary of Lt. Daley which delayed the ability to take or finish six other depositions, Defendants' pending Motion to Compel and the pending Motion to Compel Deposition of Rosemary Scapicchio.
3. Subject to the court's approval, the parties have scheduled all of the remaining

depositions which can be scheduled at this time. The proposed schedule of depositions is as follows:

Sgt. Willis Saunders	2:00 p.m.	Friday, February 9, 2007
Francis M. Roache	2:00 p.m.	Monday, February 12, 2007
Attorney Robert George	10:00 a.m.	Tuesday February 13, 2007
Defendant Richard Walsh (2 nd day)	10:00 a.m.	Thursday February 15, 2007
Plaintiff Shawn Drumgold (2 nd day)	10:00 a.m.	Monday, February 19, 2007
Defendant Timothy Callahan (2 nd day)	10:00 a.m.	Wednesday, February 21, 2007
Assistant District Attorney David Meier (2 nd day)		
	10:00 a.m.	Monday, February 26, 2007
Former District Attorney Ralph Martin	10:00 a.m.	Thursday, March 1, 2007
Boston Police Lt. John Daley (3 rd day)	10:00 a.m.	Friday, March 2, 2007
Linda and Ronda Hamilton	10:00 a.m.	Tuesday, March 13, 2007 or Thursday, March 15, 2007 (depositions in New York City)

4. The potential remaining unscheduled discovery consists of
 - a. Deposition of Rosemary Scapicchio if ordered by the court;
 - b. Depositions of Richard Lehr, Boston Globe Reporter if ordered by the court;
 - c. Deposition of witness subject to Defendants' Motion to Compel.
5. The parties have made great efforts to complete discovery as soon as possible. The parties request a hearing with the court to resolve any outstanding discovery issues and to discuss scheduling.

Respectfully submitted,
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